

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

LEJILEX; CRYPTO FREEDOM ALLIANCE OF TEXAS,

Plaintiffs,

v.

SECURITIES AND EXCHANGE COMMISSION; ERIC R. WERNER; GARY GENSLER; CAROLINE A. CRENSHAW; JAIME E. LIZARRAGA; HESTER M. PEIRCE; and MARK T. UYEDA, in their official capacities,

Defendants.

C.A. No.: 4:24-cv-00168-O

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), defendants respectfully request a 28-day extension to answer or otherwise respond to the complaint.

1. Plaintiffs LEJILEX and Crypto Freedom Alliance of Texas filed the complaint on February 21, 2024.

2. Defendants are the Securities and Exchange Commission, its five Commissioners, and the Regional Director of its Fort Worth Regional Office. Defendants' current deadline to answer or otherwise respond to the complaint is April 26, 2024.

3. Defendants request a 28-day extension to answer or otherwise respond to the complaint. Defendants require this additional time to complete the process of drafting and filing

their answer or other response to the complaint. Furthermore, additional time is requested in light of deadlines in other matters and certain counsels' unavailability in connection with the Passover holiday.

4. Should this Court grant defendants' request, the new deadline to answer or otherwise respond to the complaint would be Friday, May 24, 2024.

5. Plaintiffs do not oppose the requested extension.

Dated: April 12, 2024

Respectfully submitted,

/s/ Jason J. Rose  
Jason J. Rose  
Texas Bar No. 24007946  
Securities and Exchange Commission  
801 Cherry Street, Suite 1900  
Fort Worth, Texas 76102  
(817) 978-1408 (phone)  
(817) 978-4927 (facsimile)  
rosej@sec.gov

Jeffrey A. Berger\*  
Illinois Bar No. 6282511  
Ezekiel L. Hill\*  
D.C. Bar No. 1684647  
David D. Lisitza\*  
California Bar No. 225824  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549  
(202) 551-5100 (phone)  
bergerje@sec.gov  
hillez@sec.gov  
lisitzad@sec.gov

*Counsel for Defendants*

\* Not admitted in N.D. Tex. Pro hac vice motions forthcoming.

**CERTIFICATE OF CONFERENCE**

On April 11, 2024, counsel for defendants conferred with counsel for plaintiffs, who indicated that plaintiffs are unopposed to the requested extension.

*/s/ Jason J. Rose*  
Jason J. Rose

**CERTIFICATE OF SERVICE**

I affirm that on April 12, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court for the Northern District of Texas, Fort Worth Division, by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

*/s/ Jason J. Rose*  
Jason J. Rose